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26 August 2010

VIA ELECTRONIC FILING
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Implementing a Nationwide, Broadband, Interoperable Public safety Network
in the 700 MHz Band, PS Docket No. 06-229**

Dear Ms. Dortch:

On 25 August 2010, the undersigned and Yucel Ors met with the Jennifer Manner, Pat Amodio, Brian Hurley, Walter Johnston and other Commission Staff members. The meeting took place to discuss the National Network build out process as well as the business and technical aspects of the D-Block spectrum. Further substance of the discussion is set forth in the attached handout.

In accordance with Section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically with your office. Please contact the undersigned with any questions in connection with this filing.

Respectfully submitted,



Robert LeGrande, II.
President and CEO
The Digital Decision; LLC

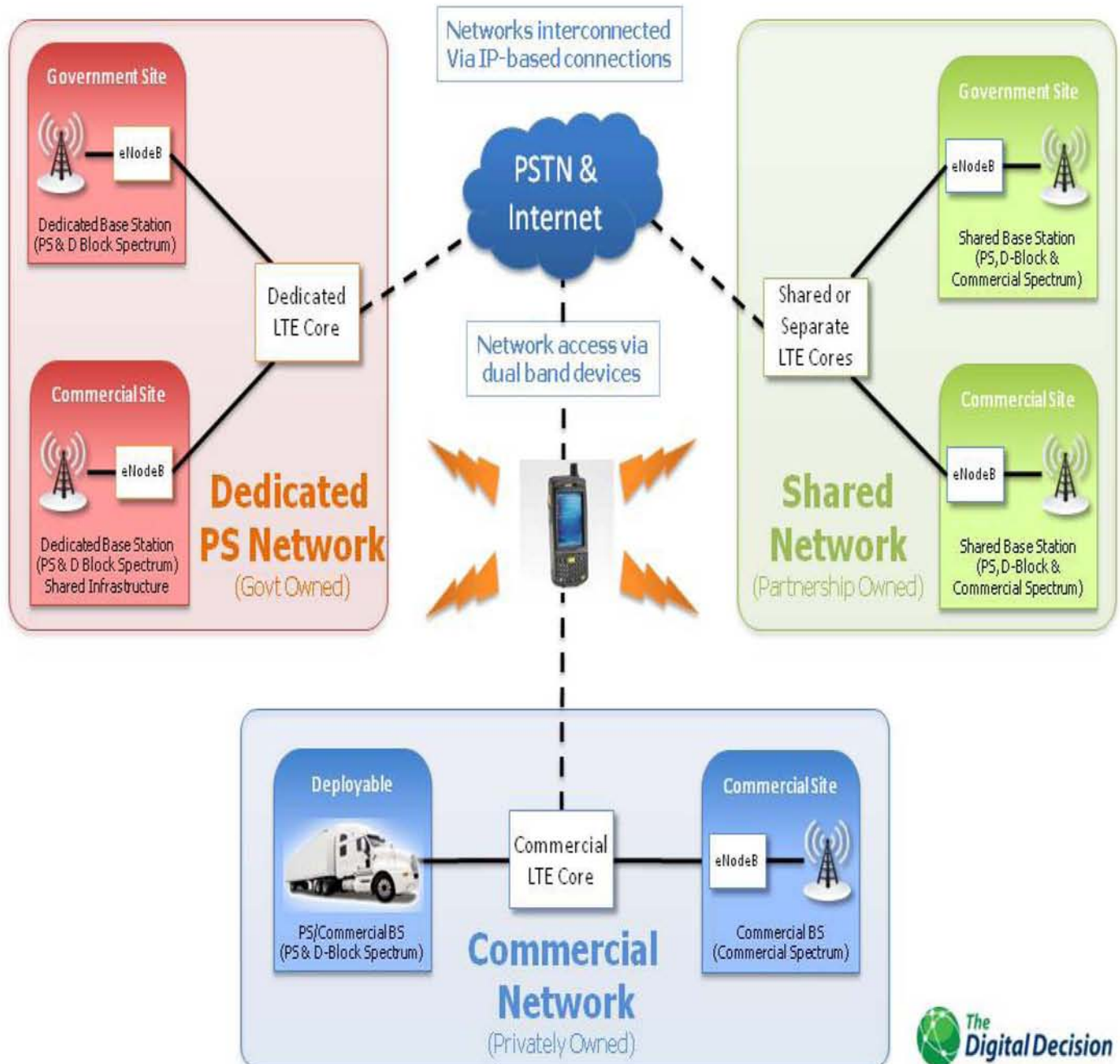
Handout:



Recommended Public Safety National Broadband Approach

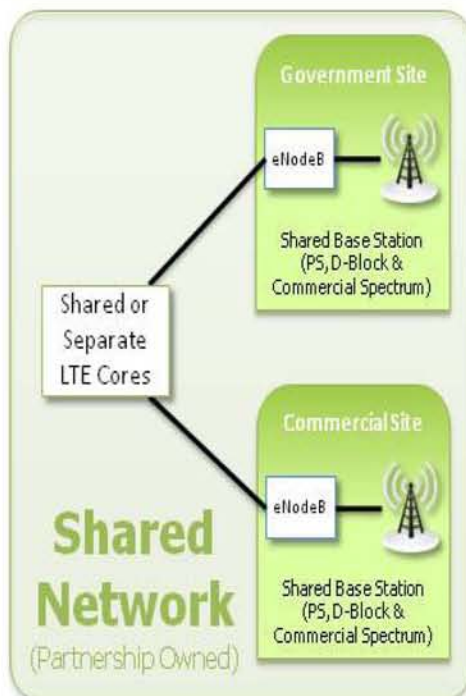
Presented by
Robert LeGrande, II.
Former CTO, District of Columbia Government
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Dedicated PS, Public-Private(Shared), and Commercial LTE networks working together to provide comprehensive PS BB Communications



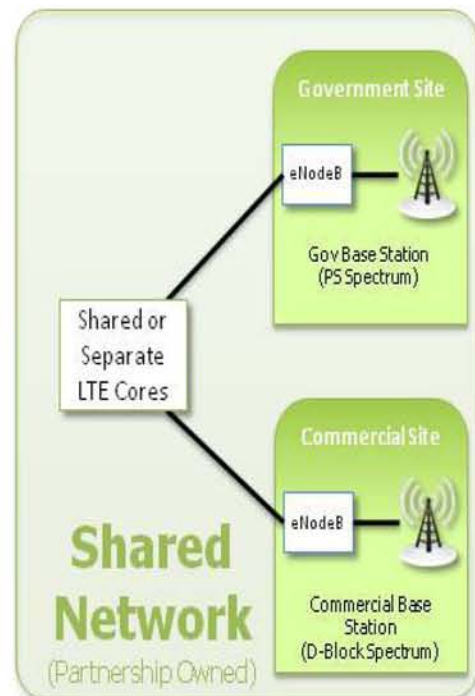
Public-Private(Shared) Options

Shared Infrastructure



- Partnership to construct and deploy Commercial and PS networks
- PS maintains day to day control over the PS and D block spectrum

D-Block Leased Spectrum



- PS partners with a commercial carrier via a RFP process to construct and deploy a private network on the PS spectrum and Public/Private network on the D-Block Spectrum
- PS maintains day to day control over the PS spectrum and defines the level of priority access needed for the D-Block spectrum

Partner/Build/Buy High-Level Business Model



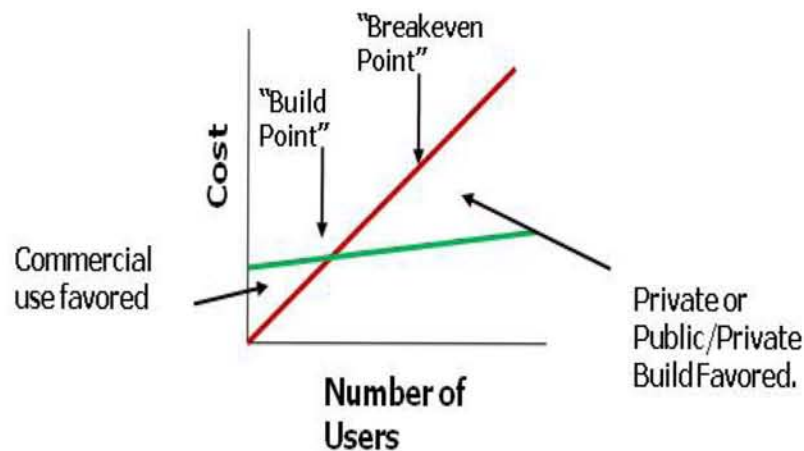
Rule of Thumb:
As The Ratio of
Network Users
to Coverage
Area Increases...



Financial analysis moves
toward favoring local
build model with all other
factors held equal.

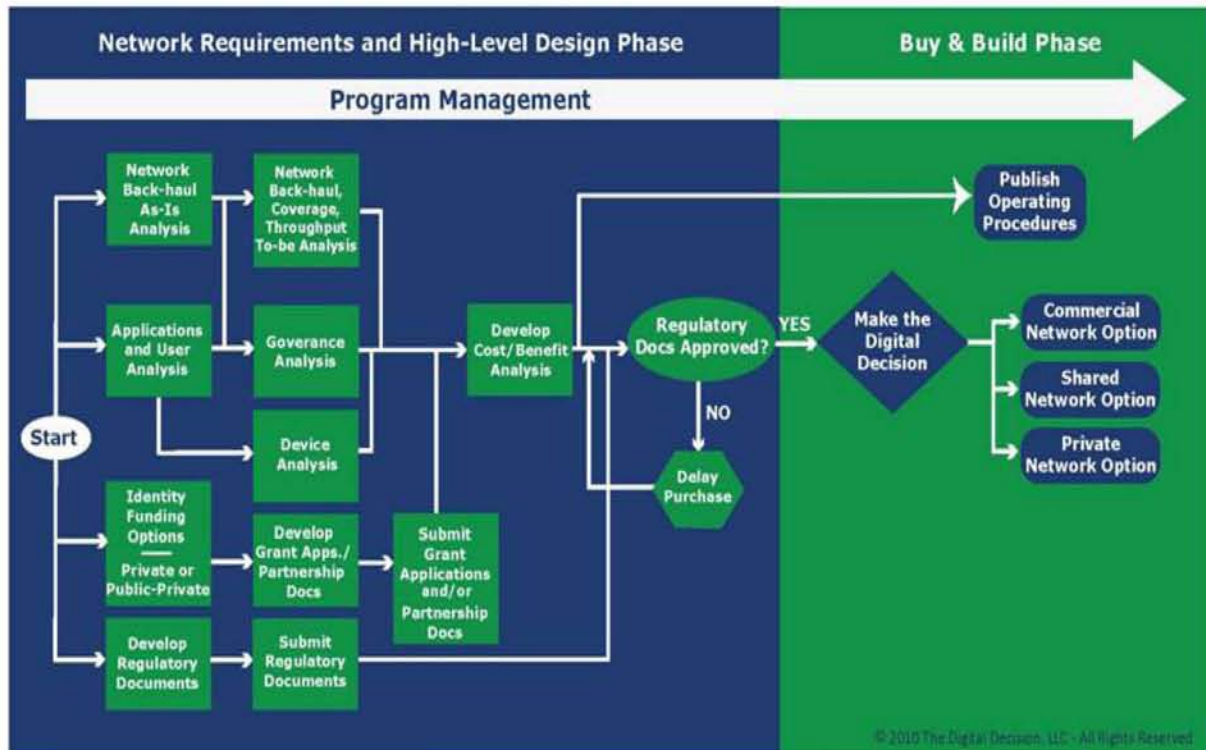


Why? Subscription Costs
of a Commercial Service
Becomes More Expensive
Than Ownership



- Commercial Subscription Cost
- Network Operating Ownership Cost

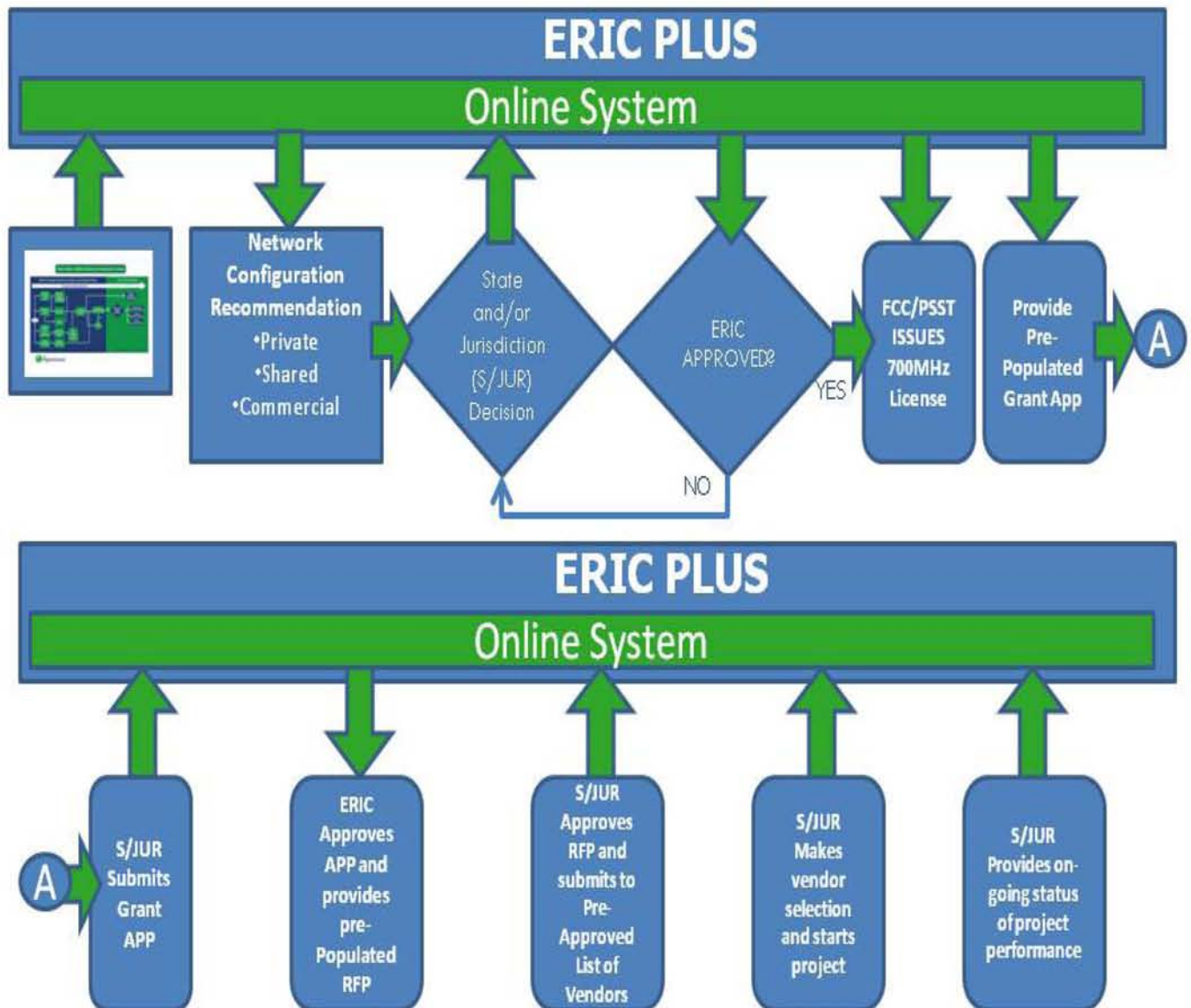
Public Safety 700MHz Network Development Process



•The above process outlines the critical steps needed to determine the “appropriate” network configuration for a State and/or local jurisdiction.

•Following a uniform network development lifecycle for all State/Jurisdictions will result in more efficient network architectures as well as standardized, seamlessly interoperable operating procedures.

Recommended National Network Build Process



Recommended National Network Build Process Benefits

- Online application requires all PS700MHz network licensees to follow a uniform network deployment approach
- Expedites all phases of network deployment
- Online system populates national public Safety communications database with detailed user, application, governance and design information
- Produces a recommended network configuration which ensures technical and operational interoperability
- Identifies all public/private partnerships nationally
- Identifies which jurisdictions have national commercial roaming and which don't
- Can be used to identify the location of PS communications assets (Cows, devices, Sat phones, etc)
- Allows us to see where we still lack communications on an ongoing basis
- Allows for day to day status of national network build out
- Sets a national network technical, governance, application and user baseline that will make changes in the future more manageable and therefore achievable
- The Online system provides critical data needed to establish and maintain a National Network Operations Center (NNOC)
- Once we start the migration from LMR to BB, we will be able to leverage the online system to manage this very sensitive transition

700MHz Public Safety Wireless Broadband Communications The New York State Association of Counties (NYSAC) Model: State Coordinated-County Built and Operated

- One Waiver/Application for authorization to deploy and operate
 - The New York State waiver authorizes all counties to access the 700MHz Public Safety Broadband spectrum. As such, the State will be sending each county a Spectrum Agreement that stipulates requirements of network use based on the FCC's regulations.
- One Grant Application for all Counties outside of NYC:
 - NYSAC in partnership with the State has submitted a NTIA Round #2B application for a State coordinated County built and controlled "system of systems" network within New York that leverages both existing county and state infrastructures.
- One network deployment program with County vendor selection, County implementation and County control and operations:
 - NYSAC plans to "Qualify" vendors for county build-outs via a single procurement through one county.
 - NYSAC's goal : To enable counties to write task orders and select from a list of qualified vendors.
- This streamlined approach creates a state-wide FCC license, grant application, procurement, as well as technical and programmatic efficiencies while ensuring local control and interoperability.
- Should federal funding become available for this critical public safety initiative, NYSAC will work in partnership with the State of New York and NYC to revolutionize public safety communications in New York.

For more information on the NYSAC model contact:
Katy Vescio (518) 465-1473 or
Robert LeGrande (703) 344-1819